UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Dear :

In 2002, the United States Environmental Protection Agency (EPA) Region III Air Protection Division began inspecting landfills subject to the New Source Performance Standards for Municipal Solid Waste Landfills, 40 C.F.R. Part 60, Subpart WWW. Since then EPA Region III has conducted approximately 25 inspections. This letter alerts you to several concerns EPA identified during these inspections.

The Subpart WWW regulations state that surface monitoring shall be conducted "... around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals AND (emphasis added) where visual observations indicate the elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover."[40 C.F.R. 60.753(d)]. Therefore, in addition to following a gas monitoring plan, you may be required to identify additional monitoring points through visual observations made during the surface monitoring. During EPA's inspections, we observed that anything visibly sticking through the surface of the landfill has a high probability of emitting more than 500 ppm of landfill gas. This includes, but is not necessarily limited to, old pipes, cement rings, leachate system components, and landfill instrumentation piping. Old piping is particularly prone to leaks because a pipe may leak from around the perimeter of the pipe as well as from from within the pipe. EPA will continue to search for these visual cues during its inspections.

Leachate collection system components located in the trash disposal area are also ripe sources of fugitive landfill gas because gas as well as leachate may migrate into the pipes. EPA consistently monitored uncontrolled landfill gas emissions exceeding the 500 ppm threshold at leachate collection system components. When fixing a leak from sideslope risers, pump houses, sumps, or pipes you should consider whether other adverse conditions are created by the repair, such as drawing in oxygen (creating a fire hazard) or drawing in gases from a POTW (if the system is connected to a public sewer system).

During EPA's inspections we noted that some landfill inspectors walked continuously during a surface monitoring pass even when they were detecting high levels of landfill gas. Method 21, Section 8.3.1, specifies that when the maximum leak concentration is found during surface monitoring, the probe has to be held at that point for twice the response time of the organic vapor analyzer. For example, a TVA-1000B analyzer's response time is 6 seconds. Therefore, this type of probe must be held at the maximum leak point for 12 seconds. You

should consult your instruction manual to determine your instrument response time and conduct your surface monitoring accordingly.

EPA expects to continue its landfill inspection program through 2005. If you need additional information about Subpart WWW compliance you may contact your state and/or local environmental agency. You may also find information about Federal regulations for landfills at EPA's Technology Transfer Network (http://epa.gov/ttn/atw/landfill/landflpg.html) or by contacting Bowen Hosford, Air Protection Division, at (215) 814-3158.

Sincerely,

Christopher B. Pilla, Chief
Air Enforcement Branch